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180711

July 23, 2003

Eileen L. Furey  
Associate Regional Counsel  
U.S. Environmental Protection Agency C-14J  
77 W. Jackson Boulevard  
Chicago, Illinois 60604

Re: Grand Trunk Western Railroad Company's Responses to CERCLA Section 104(e) Information Request - Allied Paper/Portage Creek/Kalamazoo River Superfund Site

Dear Ms. Furey:

Enclosed please find Grand Trunk Western Railroad Company's Responses to the CERCLA Section 104(e) Information Request regarding the Allied Paper/Portage Creek/Kalamazoo River Superfund Site. Grand Trunk Received this Information Request on May 28, 2003.

Documents responsive to this Request are being furnished to you in the two (2) CD's enclosed herewith. Please note that the Phase I report referenced in our written responses could not be converted to CD format at the time this response was submitted and that we will be providing a copy of this document to you via CD under separate cover.

Sincerely,

GRAND TRUNK WESTERN RAILROAD'S RESPONSES TO CERCLA SECTION 104(e)  
INFORMATION REQUESTS – ALLIED PAPER/PORTAGE CREEK/KALAMAZOO RIVER  
SUPERFUND SITE

1. The following individuals were consulted in preparing these responses:

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2. The following documents were consulted, examined or referred to in the preparation of responses to these Information Requests. Copies of these documents are provided in the CDs enclosed herewith.
  - *Phase I Environmental Assessment Report, Grand Trunk Western Railroad, Battle Creek Property, Battle Creek, Michigan* (The Dragun Corporation, November 19, 1996)
  - *Interim Remedial Action Report for the Former Skimming Pond at the Grand Trunk Battle Creek Railyard Site, Battle Creek, Michigan* (Earth Tech, 1998)
  - *Report of Findings, Drainage and Wastewater Study for the Battle Creek Yard, Grand Trunk District of Canadian National Railway, Battle Creek, Michigan* (Earth Tech, February 1999)
  - *Table 1 – Significant Materials, Storage Locations, Use Areas, Potential Means of Exposure, and Outfall* (from *Storm Water Pollution Prevention Plan, Battle Creek Locomotive Reliability Center, Grand Trunk Western Railroad Company, 409 W. Jameson Street, Battle Creek, Michigan 49017* (Earth Tech, May 1991)).
  - Lab results for Area A' free product, Huron Valley Laboratories Inc, December 16, 1999
  - WWTP Sampling Results, Second Quarter, 2003
3. Respondent is not aware of any person who is capable of providing more detailed or complete responses to any Information Request or additional responsive documents.
4.
  - a. Locomotive Reliability Center  
409 W Jameson Avenue  
Battle Creek, MI 49014
  - b. EPA ID: MID079300075  
NPDES: MI0056081 (current), MI-0003808 (rescinded)  
TSD EPA No.: MID980991566
  - c. Grand Trunk Western Railroad Company
5. Respondent has owned the facility since at least 1929.

6. Copies of the following permits are provided on the enclosed CD:
- NPDES Permit No. MI0056081
  - City of Battle Creek Discharge Authorization No. 214
  - Michigan Air Permit No. 491-95
  - Michigan Air Permit No. 218-99
7. Respondent submits the following types of reports to the Michigan Department of Environmental Quality:
- Quarterly groundwater monitoring reports concerning groundwater impacts not related to PCBs.
  - Monthly Discharge Monitoring Reports as required by NPDES permit No. MI0056081.
  - Semi-annual air monitoring reports as required by air permits No. 491-95 and No. 218-99.
8. Past and current operations at Respondent's facility include:
- Locomotive Repair – Repairs performed to locomotives at Locomotive Reliability Center (LRC)
  - Locomotive Painting (historic) – Painting of locomotives at LRC.
  - Locomotive Washing (historic) – Washing of locomotives at wash platform located southeast of LRC.
  - Locomotive Refueling – Refueling of diesel locomotives at fueling platform located to east of LRC.
  - Car Repair – Repairs to cars at Car Repair Shop, located north of Emmett Street.
  - Mainline Refueling – Refueling of diesel locomotives at mainline fueling dock.

Respondent's primary SIC code is 4011.

9. Respondent does not produce any product at the Locomotive Reliability Center.
10. N/A
11. N/A
12. N/A
13. a. According to the *Phase I Environmental Assessment Report, Grand Trunk Western*

*Railroad, Battle Creek Property, Battle Creek, Michigan* (The Dragun Corporation, November 19, 1996) enclosed herewith, Respondent at one time stored journal oil at the facility in a storage tank located in a concrete vault. This tank was removed in the fall of 1995. Although there is anecdotal evidence suggesting that some journal oil products manufactured prior to the 1976 manufacturing ban may have contained PCBs and that journal oil products containing PCBs may have been stored in this tank, Respondent is not aware of any facts or in possession of any information which would confirm that journal oil stored in this tank did, in fact, contain PCBs. Respondent did not observe any evidence of historical releases from this tank at the time of removal.

- b. The *Phase I Environmental Assessment Report, Grand Trunk Western Railroad, Battle Creek Property, Battle Creek, Michigan* (The Dragun Corporation, November 19, 1996) indicates that transformers containing PCBs may be or may have been present at the Locomotive Reliability Center. Details on the locations of the transformers are not provided in the Phase I. Table 1 of the *Storm Water Pollution Prevention Plan, Battle Creek Locomotive Reliability Center, Grand Trunk Western Railroad Company, 409 W. Jameson Street, Battle Creek, Michigan 49017* (Earth Tech, May 1991) lists two transformers, neither of which contain PCBs, immediately south of the LRC.
  - c. Respondent is not aware of any reports or other indications of leaks from transformers. The tank containing journal oil was removed in 1995 and Respondent is not in possession of any information that would indicate or suggest that journal oil had been released from this tank or from any other source.
- 14. Respondent lacks knowledge sufficient to form a belief as to whether journal oil stored in the tank referred to in the response to Request #13 may have contained PCBs and is not in possession of any data, estimates, analyses or other information establishing that PCBs were present in any concentration at all.
  - 15. N/A
  - 16. The journal oil storage tank was contained in a concrete vault. As discussed above, Respondent did not observe any signs of historical releases at the time the tank was removed and is not in possession of any information establishing that journal oil stored in that tank did, in fact, contain PCBs.
  - 17. A groundwater contour map of the facility has been provided on the enclosed CD (Figure 3).
  - 18. The groundwater is typically 10-15 feet below ground surface at the LRC.
  - 19. Respondent does not produce any product at the LRC facility and does not use any raw process water in any production process. The facility obtains its water from a local municipal water supply.

20. Respondent is not in possession of any information regarding the PCB content of the water furnished by its municipal water supply.
21. N/A
22. Respondent does not produce any product at the LRC facility. Waste streams associated with activities conducted at the LRC facility include:

Locomotive Repairs: Wastewaters generated in connection with Respondent's locomotive repair activities are impacted by diesel fuel, lube oil, varnish, alkaline degreaser, Beaver 57A degreaser, mineral spirits, paints (historic), paint solvents (historic), methanol and kerosene and are treated at the LRC's WWTP. Oil and grease is skimmed from the water in an equalization tank, pumped to a storage tank and disposed of off-site by Respondent's waste contractor (Northern Waste Systems). Water is treated in the treatment tank and discharged to the City of Battle Creek sanitary sewer system. WWTP effluent is sampled on a quarterly basis, and PCBs have never been detected in the effluent. Settled sludge is disposed of off-site by Northern Waste Systems.

The wastewater treatment plant was constructed in 1995. Prior to construction of the WWTP, wastewater was directed to a skimming pond with an effluent weir located to the north of the LRC (Figure 2) where oil and grease was skimmed from the surface. Water was then discharged to a storm sewer which in turn discharged to the Battle Creek River. The skimming pond was closed and the sludge and soils excavated in 1996 (*Interim Remedial Action Report for the Former Skimming Pond at the Grand Trunk Battle Creek Railyard Site, Battle Creek, Michigan* (Earth Tech, 1998). Two samples of skimming pond sediments were obtained and analyzed for PCBs using U.S. EPA Method 8080 prior to the excavation for purposes of characterizing the sediments for disposal. No PCBs were detected. Following excavation of the skimming pond, 12 verification soil samples were taken. PCBs were detected in one soil sample at 0.34 ppm, using U.S. EPA Method 8080. PCBs were not detected in the remaining 11 soil samples.

Waste lubricating oils and solvents generated in connection with locomotive repair activities are currently stored in used oil and fuel storage tanks in secondary containment (figure 2) and disposed of off-site by Northern Waste Systems. Non-hazardous solid wastes are place in dumpsters and disposed of off site.

Locomotive Refueling: Storm water run-off from the fueling platform is currently conveyed to an oil water separator. The diesel fuel is skimmed from the oil water separator and pumped to the waste oil storage tank (figure 2) and disposed of off-site by Northern Waste Systems. The water from the oil water separator is conveyed to the WWTP, where it undergoes additional treatment as described above. Storm water from the diesel fuel storage secondary containment is also conveyed to the WWTP and treated and discharged to the municipal sanitary sewer system.

Bioslurping Remediation System: Groundwater and recovered diesel fuel are separated by a primary and secondary oil water separator ancillary to a bioslurping remediation

system. Recovered diesel fuel is conveyed to a used fuel storage tank and disposed of off-site. The water is conveyed to the WWTP for additional treatment.

Locomotive Wash: A locomotive wash rack that was once to the south of the LRC has been removed. The water from the washing operations was conveyed to the WWTP for treatment. Prior to the construction of the WWTP, the wash water was conveyed to the skimming pond.

Boiler Blowdown: Blowdown from two boilers used at the site is conveyed to the WWTP for treatment. Prior to construction of the WWTP, blowdown was directed to a skimming pond with an effluent weir located to the north of the LRC (Figure 2). Water was then discharged to a storm sewer which in turn discharged to the Battle Creek River.

Area A' Remediation System: Respondent operates a groundwater remediation system in the vicinity of a former storage area where the journal oil storage tank was once located. Oil is separated from recovered groundwater at the Area A' remediation system using an oil/water separator. Oil recovered by this system is stored in barrels and disposed of off-site by Northern Waste Systems. Oil recovered by the Area A' system was tested for PCBs by Huron Valley Laboratories and no PCBs were detected. The recovered groundwater, which is impacted by low levels of chlorinated solvents (mainly vinyl chloride and 1,2-DCE), is treated using granular activated carbon and discharged to the storm sewer pursuant to the terms of an NPDES permit.

Area C Remediation System: Respondent operates another groundwater remediation system at a location known as "Area C". Groundwater recovered by this system, which is impacted by low levels of chlorinated solvents (mainly vinyl chloride and 1,2-DCE), is treated using granular activated carbon and discharged to the storm sewer pursuant to the terms of an NPDES permit.

Paint Shop (Removed): Respondent at one time painted locomotives at a facility known as the paint shop. A waste solvent fractionalized column extractor was used to recover solvents generated in connection with painting activities. Waste from this process included used solvents, paint, and miscellaneous solid wastes (rags, filters, etc.), none of which are likely to have contained PCBs.

Area B Remediation System: Respondent operates another groundwater remediation system at a location known as "Area B". Area B remediation system consists of an air sparge/soil vapor extraction system used to treat groundwater impacted by chlorinated solvents. Wastes from this process (spent vapor-phase carbons and air emissions) are unlikely to contain PCBs.

Former Remediation System: Respondent at one time operated two soil vapor extraction systems to treat soils impacted by chlorinated solvents. One system was located to the west of the LRC, the second was located in the vicinity of the former paint shop. Wastes from these processes (spent vapor-phase carbons and air exhaust) were unlikely to contain PCBs.



23. Respondent samples effluent from the WWTP on a quarterly basis. PCBs have never been detected in any WWTP effluent sample.

As discussed in the response to Request #22, two samples of the sediments collected from the former skimming pond were obtained and analyzed for PCBs (using U.S. EPA Method 8080) prior to the excavation of sediments and soils from and closure of the same. No PCBs were detected. (*Interim Remedial Action Report for the Former Skimming Pond at the Grand Trunk Battle Creek Railway Site, Battle Creek, Michigan* (Earth Tech, 1998). Following excavation of the skimming pond, 12 verification soil samples were taken. PCBs were detected in one soil sample at low levels (0.34 ppm) using U.S. EPA Method 8080. PCBs were not detected in the remaining 11 soil samples.

As discussed in the response to Request #13, Respondent at one time stored journal oil at the facility in a storage tank located in a concrete vault. This tank was removed in the fall of 1995. Although there is anecdotal evidence suggesting that some journal oil products manufactured prior to the 1976 manufacturing ban may have contained PCBs and that journal oil products containing PCBs may have been stored in this tank, Respondent is not aware of any facts or in possession of any information which would confirm that journal oil stored in this tank did, in fact, contain PCBs. Respondent did not observe any evidence of historical releases from this tank at the time of removal. Oil recovered by the Area A' remediation system been tested for PCBs and no PCBs have been detected.

24. See response to Request #23.

25. Effluent from the WWTP is tested on a quarterly basis. Water samples are collected using a composite sampler, and are analyzed using U.S. EPA Method 608. PCBs have never been detected in WWTP effluent.

Free product recovered at Area A' remediation system has been analyzed for PCBs by Huron Valley Labs. The analytical method was not identified in the report. No PCBs were detected by Huron Valley.

Sediments from the former skimming pond were analyzed for PCBs using U.S. EPA Method 8080 methods. PCBs were not detected in the sediments. PCBs were detected in one verification soil sample following excavation of the pond at low levels (0.34 ppm). PCBs were not detected in the other 11 verification soil samples. (*Interim Remedial Action Report for the Former Skimming Pond at the Grand Trunk Battle Creek Railway Site, Battle Creek, Michigan* (Earth Tech, 1998).

26. Sediments and soils excavated from the former skimming pond were disposed of at C & C Landfill, 14800 P Drive North, Marshall, MI 49068. As discussed in the response to Request #22, composite sediment samples were tested using U.S. EPA Method 8080 to characterize the waste prior to disposal, and no PCBs were detected.

27. WWTP: The wastewater treatment plant is located in the northwest corner of the LRC. The WWTP treats water impacted with oils, grease, solvents, and detergents from diesel repair operations, boiler blowdown, and bioslurp remediation system; and storm water runoff from the fueling dock, fuel storage tank secondary containment, and used oil and fuel storage secondary containment. The wastewater system currently treats approximately 500,000 gallons of wastewater per year, including storm water runoff. The wastewater volume was approximately 1,750,000 gallons per year when the system began operation. Wastewater sources removed since construction of the WWTP include a locomotive wash rack, an inspection pit and oil shed, and a lube oil bunker and pump house.

Skimming Pond: The skimming pond was used to treat the wastewater stream described above prior to installation of the WWTP. The skimming pond was closed and excavated in 1996. Oil was skimmed from the surface of the pond, and water discharged through a weir.

Oil/Water Separator: An oil/water separator treats storm water runoff from the fueling dock. The storm water is then conveyed to the WWTP, and the recovered oil is pumped to the used oil and fuel storage.

Used Oil and Fuel Storage: Used oil and fuel storage consists of two 8,000-gallon storage tanks located to the east of the LRC in secondary containment. Used oil and fuel is disposed of off-site by Respondent's waste contractor, Northern Waste Systems.

Paint Shop: The paint shop used a waste solvent fractionalized column extractor to recover solvents. Other wastes potentially stored at the paint shop include spent solvents, paint, and used rags and filters.

Area A' Remediation System: Recovered oil is stored in the system building, which provides secondary containment. The oil is disposed of off-site by Northern Waste Systems. The recovered groundwater is impacted by low levels of chlorinated solvents (mainly vinyl chloride and 1,2-DCE), treated using granular activated carbon and discharged to a storm sewer pursuant to the terms of an NPDES permit.

Area C Remediation System: Recovered groundwater is impacted by low levels of chlorinated solvents (mainly vinyl chloride and 1,2-DCE), treated using granular activated carbon, and discharged to a storm sewer pursuant to the terms on an NPDES permit.

- 28a. To the best of Respondent's knowledge, no PCBs have ever been stored, treated or disposed of at any of the facilities identified in the response to Request #27.
- 28b. To the best of Respondent's knowledge, no PCBs have ever been released or threatened to be released at the LRC facility. The procedures taken by Respondent to prevent,

mitigate or address the release or threat of release of other hazardous materials are set forth in the response to Request #27.

29. As discussed in the response to Request #25, the former skimming pond has been closed, and the sediments and soils excavated and disposed of off-site at C & C Landfill. The area is currently an open area covered by grass and other vegetation. No residual wastes remain in the area.

The paint shop and waste solvent fractionalized column extractor referred to in the response to Request #27 are no longer in use, and no residual wastes remain in the area. All wastes have been disposed of off-site in accordance with regulatory requirements.

As discussed in the response to Request #22, Respondent previously operated a soil vapor extraction system in the area of the paint shop to remediate soils impacted by solvents. The cleanup is complete, and the system removed.

30. See Figures 1 and 2 on the enclosed CD. Due to the considerable distance between the LRC facility and the Kalamazoo River, Respondent is unable to provide a drawing depicting both the Kalamazoo River and the LRC facility with any reasonable degree of detail. Figure 1 shows the LRC's general location relative to the Kalamazoo and Battle Creek Rivers. Figure 2 depicts the areas discussed in the previous responses.
31. WWTP: As discussed in the response to Request #25, quarterly samples are collected from WWTP effluent. PCBs have not been detected in the effluent. Organic compounds associated with petroleum products, primarily benzene, toluene, ethyl benzene and xylenes, are observed at low levels in the test results. The treated wastewater is discharged to the sanitary sewer system.

Skimming Pond: Respondent is not in possession of any data, records, analyses or other information regarding the content of effluent discharged from the skimming pond. Sediments from the former skimming pond were analyzed for PCBs using U.S. EPA Method 8080 and no PCBs were detected. Data generated in connection with skimming pond characterization and verification sampling is included in Attachment B.

Oil/Water Separator: The treated water is conveyed to the WWTP, where it undergoes additional treatment. As discussed above, the WWTP effluent is discharged to the sanitary sewer, and quarterly effluent monitoring is performed. The oil is pumped to the used fuel storage tank, which is located in secondary containment. The waste oil is properly disposed of off-site. Respondent is not aware of any releases of PCBs or other hazardous substances from this operation.

Used Oil and Fuel Storage: Used oil and fuel storage consists of two 8,000-gallon storage tanks located to the east of the LRC in secondary containment. The tanks are protected by a secondary containment system and the used oil and fuel are properly disposed of off-site by Respondent's waste contractor, Northern Waste Systems.

Respondent is not aware of any releases of PCBs or other hazardous substances from this operation.

Paint Shop: The paint shop is no longer in operation. As discussed in the response to Request #22, Respondent previously operated a soil vapor extraction system to remediate soils impacted by solvents. The system was decommissioned following completion of the cleanup. No PCB releases are known or suspected from this area.

Area A' Remediation system: As discussed in the response to Request #22, recovered oil is stored in the system building, which provides secondary containment. The oil is disposed of off-site by Northern Waste Systems. The oil was tested for PCBs by Huron Valley Laboratories and no PCBs were detected. The recovered groundwater is impacted by low levels of chlorinated solvents (mainly vinyl chloride and 1,2-DCE), treated using granular activated carbon and discharged to the storm sewer pursuant to the terms of an NPDES permit. Respondent is not aware of any releases of PCBs in this area.

Area C Remediation System: As discussed in the response to Request #22, recovered groundwater is impacted by low levels of chlorinated solvents (mainly vinyl chloride and 1,2-DCE), treated using granular activated carbon and discharged to a storm sewer pursuant to the terms on an NPDES permit. Respondent is not aware of any releases of PCBs in this area.

32. Respondent is not in possession of any data, facts, analyses or other information that would indicate or suggest that any PCBs or other hazardous substances were ever released from any location at the LRC facility into the Kalamazoo River or any other area of the Site.
33. The LRC is not within the 100-year or 500-year flood zones of either the Battle Creek River or Kalamazoo River based on FEMA flood data.
34. See response to Request #22.
35. a. The volume of wastewater treated at the WWTP is discussed in the response to Request #27. The table below summarizes the estimated volumes used for design of the WWTP. The table also summarizes estimated volumes today, based on reduced operations.

Source	Volume, 1996 (gallons/year)	Volume, 2003 (gallons/year)
Diesel Repair	80,000	40,000
Boiler Blowdown	NA	NA
Locomotive Wash	1,440,000	0
Fueling Dock	400,000	270,000
Inspection Pit	21,210	0
Fuel Storage	100,000	100,000
Used Oil and Fuel Storage	15,000	15,000
Bioslurp	0	75,000

The Area A' and Area C Remediation Systems are permitted for 72,000 gallons of water per day each. However, Area A' typically produces approximately 7,000 gallons per day. Area C typically produces 7,000 gallons per day April through October, and 3,500 gallons per day November through March.

- b. The waste oil and fuel storage tanks (8,000 gallons each) are emptied every six months, so the LRC generates an average of approximately 1,250 gallons per month each of used lubricating oil and diesel fuel. The waste oil is generated by the diesel locomotive repair operations. The waste diesel fuel is generated primarily by the bioslurp remediation system and storm water runoff from the fueling dock.

The Area A' remediation system has produced approximately 400 gallons of recovered oil in the last three years, or approximately 10 gallons per month.

- c. All oil/water waste streams are discussed in part a or b of this response and in the response to Request #22.
36. All data, estimates, analyses and other information referred to in this Request have been provided in the responses to Requests 23 and 24.
37. As discussed in the response to Request #25, no PCBs have ever been detected in effluent from the WWTP.
38. Respondent has never implemented any procedures or measures to prevent, mitigate or address the release of PCBs to the Kalamazoo River because there has never been any release or threatened release of PCBs from the LRC facility.
39. As discussed in the response to Request #35, the WWTP was originally designed to treat approximately 2,000,000 gallons per year (170,000 gallons per month) of wastewater. Due to the removal of the locomotive wash rack and other reductions at the LRC, the plant now treats less than 50,000 gallons per month. As discussed in the response to Request #22, no PCBs have ever been detected in quarterly effluent samples collected from the WWTP.

Respondent lacks knowledge sufficient to form a belief as to whether PCBs have ever been discharged from the POTW.

40. There are two outfalls from which Respondent discharges to the Battle Creek River, both of which are depicted on Figure 2:

Outfall 001: The Area A' and Area C remediation systems discharge to the Battle Creek River via outfall 001 under NPDES permit MI0056081. The Area C system has discharged since January 2000, the Area A' system has discharged since October 2002. Both systems discharge treated groundwater. The groundwater, which is impacted with chlorinated solvents (primarily 1,2-DCE and vinyl chloride), is treated by granular activated carbon at Area C, and by an oil/water separator and granular activated carbon at Area A' prior to surface water discharge. The Area A' and Area C Remediation Systems are permitted for 72,000 gallons of water per day each. However, Area A' typically produces approximately 7,000 gallons per day. Area C typically produces 7000 gallons per day April through October, and 3500 gallons per day November through March.

The former skimming pond discussed in the response to Request #22 discharged to outfall 001 until the pond's closure in 1995.

Outfall 002: The Area D remediation system discharges to the Battle Creek River via outfall 002. The system began discharging treated groundwater in January 2003. The groundwater, which is impacted by chlorinated solvents (vinyl chloride and 1,2-DCE), is treated by air stripping. Approximately 4,320,000 gallons of water are discharged per month. The discharge is covered under NPDES permit MI0056081.

41. Dates of use, outfall sources, and discharge volumes are discussed in the response to Request #40.
42. Effluent and influent data at the Area A', C and D remediation system does not include PCB data. The recovered oil from A' has been analyzed and no PCBs were detected, as discussed in the response to Request #22.

Effluent data is unavailable for the former skimming pond. As discussed in the response to Request #22, PCBs were not present in sediment samples from the pond characterized during the closure and excavation of the pond.

43. Outfall 001. Respondent is not aware of any bypasses or spills from this outfall.

Outfall 002. Respondent is not aware of any bypasses or spills from this outfall.

44. To the best of Respondent's knowledge, no PCBs have ever been disposed into the Kalamazoo River as a result of wastewater, waste oil or wastewater/waste oil discharges from Respondent's facility.

45. As discussed in the response to Request #22, the former skimming pond was closed and sediments and soils were excavated in 1996 (*Interim Remedial Action Report for the Former Skimming Pond at the Grand Trunk Battle Creek Railyard Site, Battle Creek, Michigan* (Earth Tech, 1998). Two samples of the sediments were obtained and analyzed for PCBs using U.S. EPA Method 8080 prior to the excavation, to characterize the sediments for disposal. No PCBs were detected. Following excavation of the skimming pond, 12 verification soil samples were taken. PCBs were detected in one soil sample at 0.34 ppm, using U.S. EPA Method 8080. PCBs were not detected in the remaining 11 soil samples.
46. Respondent has never conducted any environmental response action involving PCBs or PCB-containing materials at Respondent's facility or at any of the other locations referred to in this Request.
47. The following people may have knowledge or information about the generation, transportation, treatment, disposal, release or other handling of waste materials at the facility:

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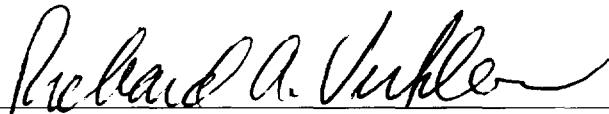
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Warren, MI 48093  
PH: (586) 757-7340

48. No.
49. Respondent is not in possession of any data, estimates, analyses or other information regarding the relative contributions of PCBs to Lake Allegan from "facilities" as that term is defined in CERCLA.

GRAND TRUNK WESTERN RAILROAD COMPANY

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